

AEA COMMENTS
FAA SNPRM ON IMPROVED SEATS IN
AIR CARRIER TRANSPORT CATEGORY AEROPLANES
(Docket No FAA-2002-13464; Notice No 02-17)

AEA Comment:

As part of its general commitment to safety, the AEA supports proposals to increase passenger protection and post-crash survivability, provided a convincing safety benefit case has been made.

However, with regard to the SNPRM on Improved Seats in Transport Category Aeroplanes, the AEA believes that some aspects have not been fully thought through since they are missing a convincing safety case & impact assessment.

The AEA supports the submission made by the Air Transport Association of America Inc. (ATA).

Main AEA concerns :

Since many years already and as part of their commitment to safety, AEA airlines have been replacing seats with “16g compatible seats” on a voluntary basis and they will continue to do so. The FAA rule does not seem to accommodate for those pro-active investments made by many airlines.

Testing has shown that compliance with the structural requirements of 25.562 only, provides for a significant increase in safety level. The additional requirements on occupant protection (e.g. Head Injury Criteria (HIC) and front-row rules) would require costly re-certification programmes and changes in seat-layout, which are not justified based on the marginal additional safety improvement. A safety case is missing for those additional requirements since the FAA’s Cost/Benefit Analysis does not specify the percentage of casualties /injuries due to unfulfilled HIC and front-row rules.

Similarly, a cost/benefit calculation for the retrofit of cabin attendant seats is missing. Although the value of able-bodied cabin attendants in a post-crash scenario is recognized, the number of passenger-averted-fatalities attributable to the actions of cabin attendants who survived the impact as result of improved 16 seats, does not seem to be very well justified. The estimated replacement costs are also far too optimistic, since a cabin attendant seat usually remains with the aircraft for the whole lifetime of the aircraft.

Brussels, 3rd March 2003

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